

**Southern Nuclear Operating Company
ND-18-0413
Enclosure 4**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Docket No.: 52-025 & 52-026**

Completion Plan for Uncompleted ITAAC 3.3.00.07d.v.a [Index Number 809]

ITAAC Statement

Design Commitment

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

Inspections, Tests, Analyses

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

Acceptance Criteria

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

v.a) For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

ITAAC Completion Description

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. In accordance with this ITAAC, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance and for which no barrier or analysis is provided is considered as associated circuits and subject to Class 1E requirements. The subject ITAAC requires inspections of the Class 1E and non-Class 1E raceways inside containment to confirm that non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements. The Class 1E cables and raceways and non-Class 1E cables inside containment are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation Specifications provided to the constructor identify separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are installed in accordance with design drawings, installation specifications issued for construction and work package requirements. Completed raceway installation, in-progress cable installation, and completed cable terminations are inspected to ensure the separation installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). The completed inspection records document the

satisfactory separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Reports XXX (References 3 and 4) identify the inspection reports associated with the raceway separation inspections and confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

The Cable Separation Reports (References 3 and 4) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 3.3.00.07d.v.a Completion Packages (References 5 and 6, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. APP-GW-E1-001, Electrical Systems Design Criteria
2. 26139-000-4MP-T81C-N7101, Bechtel Construction Quality Verification Program
3. Unit 3 Cable Separation Report XXX
4. Unit 4 Cable Separation Report XXX
5. Unit 3 ITAAC 3.3.00.07d.v.a Completion Package
6. Unit 4 ITAAC 3.3.00.07d.v.a Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"